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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

DAVID HOUGH; *et al.*

Plaintiffs,

vs.

RYAN CARROLL; *et al.*

Defendants.

Case No.: 2:24-cv-02886-WLH-SK

**STIPULATION TO STAY  
SPECIALLY APPEARING  
DEFENDANTS BONNIE NICHOLS  
AND WHOLESALE UNIVERSE'S  
TIME TO FILE A RESPONSIVE  
PLEADING PENDING  
PLAINTIFFS' FORTHCOMING  
SECOND AMENDED COMPLAINT**

Presiding Judge: Hon. Wesley L. Hsu  
Trial Date: N/A

**STIPULATION TO STAY DEFENDANTS BONNIE NICHOLS AND  
WHOLESALE UNIVERSE'S TIME TO FILE A RESPONSIVE PLEADING  
PENDING PLAINTIFFS' FORTHCOMING SECOND AMENDED  
COMPLAINT**

1 This Stipulation is entered into by and between Plaintiffs on the one hand, and  
2 Specially Appearing Defendants Bonnie Nichols and Wholesale Universe, on the  
3 other hand, through their respective counsel of record.  
4

5 WHEREAS, Plaintiffs have received third-party documents and intend to  
6 amend the currently operative First Amended Complaint to add new defendants and  
7 new allegations about existing defendants;  
8

9 WHEREAS, Plaintiffs require additional time to investigate entities and  
10 individuals to potentially be added as defendants, and to further investigate  
11 forthcoming new allegations about existing defendants;  
12

13 WHEREAS, Plaintiffs anticipate receiving additional discovery from Wells  
14 Fargo, Thread Bank, Bank of America, and JP Morgan—including discovery of  
15 account statements, wire transfers, and third-party-agent/payment-processor  
16 transaction data—within the next six weeks;  
17

18 WHEREAS, Plaintiffs anticipate that the new discovery, will significantly  
19 further inform Plaintiffs' allegations;  
20

21 WHEREAS, it would be most efficient—and in the interests of justice—for  
22 Plaintiffs to wait to file a second amended complaint until Plaintiffs have reviewed  
23 the forthcoming discovery that they anticipate receiving shortly;  
24

25 WHEREAS, it would also be inefficient for Specially Appearing Defendants to  
26 respond to the currently operative complaint when the parties anticipate that another  
27 amended complaint will be filed;  
28

1 IT IS HEREBY STIPULATED AND AGREED by the parties as follows:

2 The deadline for Specially Appearing Defendants Bonnie Nichols and  
3 Wholesale Universe to file responsive pleadings to the current complaint should be  
4 stayed.  
5

6 Specially Appearing Defendants Bonnie Nichols and Wholesale Universe  
7 should be ordered to file a responsive pleading no later than 30 days from the date  
8 Plaintiffs file and serve their Second Amended Complaint.  
9

10 This stipulation is made without prejudice to any party's right to seek further  
11 extensions or modifications by agreement or by order of the Court for good cause.  
12

13 IT IS SO STIPULATED.

14 Dated: August 20, 2024

15  
16 /S/ Nico Banks  
17 Nico Banks (CA SBN:344705)  
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*Attorneys for Plaintiffs*

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By: /s/Brad Geyer  
Brad Geyer  
Attorney for Specially Appearing  
Defendants Bonnie Nichols and  
Wholesale Universe

**WORD COUNT COMPLIANCE CERTIFICATION**

The undersigned, counsel of record for Plaintiffs, certifies that this brief contains fewer than 7,000 words, which complies with the word limit of L.R. 11-6.1

/s/Nico Banks

Nico Banks

Dated: August 20, 2024

**ATTESTATION**

Pursuant to L.R. 5-4.3.4, I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

/s/ Nico Banks  
Nico Banks